

## **REMARKS**

In this paper, we amended various claims. We also amended the specification to correct various minor errors of typographical, grammatical, or clerical nature. Presently, the application contains claims 1-25. We kindly request favorable reconsideration and allowance of all claims in the application.

## **HILTON DAVIS / FESTO STATEMENT**

We did not make the claim amendments for any reason related to patentability. Rather, these changes seek to implement various improvements in form, effect some stylistic changes, and make explicit what was already inherent to the claims.

## **35 USC 103 REJECTIONS**

The office action rejected claims 1-25 under 35 USC 103 as being unpatentable over the combination of McDonough and Rao. The claims are patentable because the references do not teach all of the claimed features, and also the McDonough-Rao combination is unwarranted.

McDonough-Rao does not teach all of the claimed features. Taking claim 1 as an example, the office action admitted that McDonough does not teach an FTP server. We agree. McDonough does not explicitly or implicitly teach an FTP server. Along these lines, McDonough further lacks the various FTP related features of the claims, some examples including (1) a mapping of which of said users are authorized to conduct FTP download of which digital objects, (2) a web page providing instructions for user seeking to conduct FTP download of digital objects, (3) generating and transmitting a temporary FTP access code, (4) re-authenticating based on the FTP access code, and (5) making digital objects from the library available for FTP download.

The office action proposed that McDonough uses a general back-end server to distribute data. This, however, paints as too-broad picture of McDonough. McDonough does mention in general (vague) terms the tasks of conducting an information-accessing session, keeping track of which system

information a user is authorized to retrieve during a single session, and providing user access to information only from particular applications. However, McDonough does not discuss any examples of this information access other than simply controlling access to pages of information, and namely, providing web pages to requesting users. In this regard, McDonough's only disclosure as to the accessed information concerns different web pages and "realms" such as [www.xyz.com/accounts](http://www.xyz.com/accounts) and [www.xyz.com/purchasing](http://www.xyz.com/purchasing). In this regard, McDonough explicitly states that the "information" is organized into pages that are logically arranged in accordance with a hierarchical directory structure that allows the browser software to identify each of the pages by a Uniform Resource Locator string ("URL") such as "<http://www.xyz.com/accounts/ab/page1.html>." And, despite McDonough's alluding to different back end processing software "types," the processing software only renders information consisting of web pages ("The authorized application codes "AB" and "CD" indicate that the user's access is further limited to pages of information from application software types 'AB' and 'CD'...") In view of McDonough's limited teaching, the disclosure should be read narrowly rather than broadly, since McDonough's lack of further examples and embodiments distinctly limits the extent of teaching that McDonough can fairly enable a prior art reference.

And, as to the contention that the functioning of FTP servers and back-end servers are largely similar, supporting the rationale for adding Rao's FTP server to McDonough, we respectfully submit that the function of an FTP server is irrelevant to McDonough's objective to provide access to the stated type of information, namely, web pages. Nowhere does McDonough demonstrate any interest, facility, modification, or other concern with information beyond web pages, such as large software files, data files, and other digital data objects for which FTP would be a useful conveyance. Accordingly, the functioning of FTP servers is extraneous to McDonough. McDonough is similarly unconcerned with acting as an email server, text messaging server, web feed server, fax server, proxy server, database server, and many other types of data that is provided by servers.

McDonough-Rao lack other features of the claims as well. For instance, they do not teach a web server authenticating users, generating a temporary FTP access code for each authenticated user, and transmitting each temporary FTP access code to the user for which the code was generated, and then an FTP server re-authenticating said redirected users. First, McDonough does not show an FTP server, as discussed above. Second, even though McDonough is said to employ a distributed computing arrangement, all of McDonough's back end servers 18-22 are positioned behind the web server computer 16, which serves as the gatekeeper. Even if one of the servers 18-22 of McDonough were to be over generously (improperly) read as an FTP server, there is no teaching that clients would have direct access to such a server, or that such a server would re-authenticate users. Therefore, McDonough-Rao do not show user access to both web and FTP servers, and actions by the FTP server to re-authenticate users.

The applied art further lacks a web server "redirecting each authenticated user to the FTP server." Rather, McDonough explicitly teaches an inconsistent approach, since McDonough uses one server to serve as a gatekeeper to the other servers, which relieves the other servers of the burden of checking for authorization each time a request for information is received. Indeed, "the gatekeeper determines a specific application software instance (e.g., instance 34) for processing the request (step 1150)." Thus, the back-end servers are insulated from the client, since the client's request causes interaction between the web server computer and one of the back-end server computers (e.g., computer 20) to produce the information requested for inclusion in the substantive response. ("The request then causes interaction between the Web server computer and one of the back-end server computers (e.g., computer 20)... to produce the information requested for inclusion in the substantive response.") Accordingly, McDonough teaches an approach that is inconsistent with the claimed redirecting operation.

For the foregoing reasons, we submit that claim 1 is patentably distinguished from the applied art. Independent claims 4, 9, 12, 17, 20, 21 are

patentable for similar (and in some cases additional) reasons. Even without individually discussing any of the dependent claims, these are all patentable because they depend from allowable independent claims. Moreover, many are patentable on their own merits. To list one of many examples, McDonough-Rao fails to teach the specific operation of sending an FTP uniform resource locator (URL) including an encrypted login ID and an encrypted password and an address of the FTP server.

#### CONCLUSION

In view of the foregoing, all pending claims in the application are patentable over the applied art.

#### FEES

If any fees are required by this submission, an appropriate fee submittal sheet is enclosed herewith. If fees are required yet this sheet is inadvertently missing, or the fees are incorrect in amount, please charge the charge the required fees (or credit any overpayment) to Deposit Account No. 07-1445.

Respectfully Submitted,



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